

DRAFT 7-17-08

Mr. Howard Orlean
U.S. Environmental Protection Agency, Region 10
1200 Sixth Avenue, AWT-121
Seattle, WA 98101

Subject: *Draft Stormwater Pathway Investigation Work Plan* for the Univar USA Inc.
Facility dated June 25, 2008

Dear Mr. Orlean:

The Oregon Department of Environmental Quality (DEQ) appreciates the opportunity to provide comments on Univar's Stormwater Pathway Investigation workplan, dated June 25, 2008. Univar's facility discharges into the City of Portland's (COP) Outfall 18 stormwater conveyance system and this stormwater evaluation is a crucial piece of the overall evaluation of stormwater source control needs within that outfall basin.

DEQ also appreciates the thoroughness of Univar's workplan and Univar's willingness to align it with DEQ's Guidance for Evaluating the Stormwater Pathway at Cleanup Sites (5/08 Draft). This will help ensure that the investigation will produce the information DEQ needs to assess source control needs for both the site and the basin as a whole.

DEQ's comments include requests for the opportunity to review and comment on certain decisions/workplans that will arise as the evaluation unfolds. These requests are aimed at ensuring that the data produced through this investigation will continue to meet DEQ's needs and to minimize the likelihood that additional work or rework will be needed. If EPA supports these requests, DEQ will make it a priority to expedite its reviews to minimize any impacts to Univar's proposed schedule. DEQ is also willing to meet with Univar and/or EPA at the site to work through any of these questions/issues if either party would find that to be helpful for reaching agreement on workplan specifics.

Comments

1. DEQ requests that Univar provide the following information to assist DEQ with both its evaluation of proposed sampling locations and its interpretation of sampling data.

- When were catch basins on the site last cleaned out? What is the anticipated schedule for cleaning them out in the upcoming year? Will this occur before, during or after the sampling events, assuming sampling occurs on the proposed schedule?
- Please provide the complete data set of historical NPDES stormwater sampling data, indicating sampling locations and dates.

- Please provide additional information on the east drive re-paving project. What is the overall objective of this project and its schedule for completion? Describe that soil sampling that took place or is planned to be undertaken in conjunction with the project and provide maps showing sampling locations and laboratory data reports from previous sampling efforts. Describe the excavation activities, including the timeframe of soil disturbance, and the procedures and findings for soil characterization and disposal.
- What does Univar believe to be the source of the pesticides detected in soil samples from the east drive re-paving project? Is there reason to believe these chemicals may also be present at elevated concentrations elsewhere on the site? Is Univar planning any additional soil sampling efforts to characterize the nature and extent of pesticide contamination on the site?

2. Section 5.1 indicates that the list of COIs will be restricted to those chemicals that are associated with Univar's operations and cleanup activities and are listed in the draft DEQ guidance. However, Section 5.5 of the DEQ guidance clearly states that some sites may have additional site-specific COIs which potentially include chemicals that are not included in the list of chemicals in Appendix D of the guidance. Given this, Univar should not use the list of chemicals in the DEQ guidance as a "filter" for its list of site COIs.

3. Section 5.2 indicates Univar's intent to provide an updated stormwater drainage map after completing a more thorough of the stormwater system. The updated map should more accurately depict the boundary of the areas that drain to each discharge point into the stormwater collector along the eastern border of the site and the direction of overland flow toward each inlet/catch basin within each drainage area.

4. In Section 5.3, the second paragraph states that Univar will eliminate potential COIs from the SPI evaluation if they are below laboratory MRLs and/or detected below SLVs in catch basin sediment and stormwater samples, not handled in bulk at the property, not handled outside of the warehouse at the property, and not sampled for under the current groundwater and stormwater monitoring programs. DEQ does not support this approach. The inherent variability of catch basin sediment samples and stormwater samples and the limited number of samples being proposed under this approach warrant a conservative approach to data interpretation. Other lines of evidence should be considered before dropping any chemicals from the analyte list, such as the pesticide detections in soil sampling data from the eastern drive and the elevated PCB concentrations found in stormwater, suspended sediment and inline sediment samples collected by the City of Portland and the Lower Willamette Group in Outfall Basin 18. DEQ requests the opportunity to review and comment on any proposed changes to the analyte list to ensure the sampling efforts will result in sufficient data to support any decisions regarding stormwater source control at the site.

5. Section 6.1 lays out the rational for selecting chemicals to be included as site COIs. In accordance with comment #2 above, DEQ recommends that all COIs associated with

historical spill and releases (Section 6.1.1) be retained. However, DEQ supports Univar's contention in Sections 6.1.5 and 6.1.7 to drop a few chemicals from the list as DEQ does not view these chemicals as site COIs.

6. In Section 7.2, the second bullet indicates that Univar may undertake cleaning and flushing of the stormwater lines if necessary to complete its groundwater infiltration evaluation. If Univar finds it necessary to conduct line cleaning/flushing, DEQ requests that they follow the procedures and notification requirements described in the fact sheet found at <http://www.deq.state.or.us/lq/cu/nwr/PortlandHarbor/docs/CatchBasinInlineSediments.pdf>. This would include obtaining prior approval for the waste characterization and disposal workplan to ensure that the analytical suite is adequate to support the source control evaluation.

7. In Section 7.2, the last paragraph indicates that Univar will produce a revised stormwater drainage basin map upon completing the drainage system evaluation, and will use this information to select representative locations for catch basin sediment sampling. See comment #3 above regarding refinements to the map. In addition, DEQ requests the opportunity to review and comment on the proposed catch basin sampling locations before Univar commences with sampling to ensure the selected locations will provide the most useful information for the stormwater source control evaluation.

8. With regards to Section 7.3, if the video inspections indicate groundwater infiltration is occurring and therefore further evaluation is needed, DEQ requests the opportunity to review and comment on the proposed catch basin sampling workplan prior to the commencement of sampling to ensure the workplan will produce information DEQ needs to support its assessment of source control needs at the site.

9. Section 8.4 describes the proposed stormwater sampling locations. DEQ has several questions or concerns about the proposed locations for stormwater sampling. For example, DEQ would prefer to see catch basin sediment data from Drainage Areas #5 and #6 before determining whether stormwater sampling is warranted in these areas. In addition, DEQ would prefer to evaluate the catch basin sediment data and possibly historical NPDES data to assess whether the proposed locations are best suited to the objectives of this investigation, and to better understand the nature and schedule of the repaving work on the eastern driveway, before the stormwater sampling locations are finalized. Accordingly, DEQ requests the opportunity to provide comments on the proposed stormwater sampling locations after obtaining and reviewing said information.

10. Section 10.0 describes Univar's proposed reporting schedule. DEQ recommends that Univar augment its reporting schedule by providing a number of interim reports for agency review to ensure the investigation is proceeding in a manner that will produce the information necessary for accomplishing the objectives of this evaluation. Specifically, DEQ recommends that Univar submit the results of the catch basin sampling events prior to initiation of stormwater sampling so that the agencies can provide input on stormwater sampling locations based upon those findings. DEQ also recommends that Univar submit interim data reports from each stormwater sampling event to ensure data quality.

objectives are being met and to help identify any source control concerns or questions earlier rather than later in the process so the approach can be modified or other actions be undertaken as appropriate.

11. Note that the screening tables in Appendix D of DEQ's draft guidance document contain two worksheets with stormwater SLVs. One table is for Portland Harbor sites and the other is for non-Portland Harbor sites. Most SLVs are the same but there are a few differences. It appears that you referenced the non-Portland Harbor worksheet in Table 7, and possibly other tables as well.

Sincerely,

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Environmental Cleanup Section

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